

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Case No. 23-03475
Daniel Showley) Chapter 13
) Judge: Janet S. Baer
Debtor)

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Daniel Showley
160 S Randall Rd
Aurora, IL 60506

DAVID CUTLER
4131 MAIN ST
SKOKIE, IL 60076

Please take notice that on July 14, 2023 at 10:00 am, a representative of this office shall appear before the Honorable Judge Janet S. Baer, or any judge sitting in that judge's place, either in Courtroom 615 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604 or electronically as described below and present the Trustee's motion a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **160 731 2971** and the passcode is **587656**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

I certify that this office caused a copy of this notice to be delivered to the above listed debtor by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on July 07, 2023.

801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

/s/ Jenn Karmia
FOR: Glenn Stearns, Chapter 13 Trustee

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MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtor filed a petition under Chapter 13 on Wednesday, March 15, 2023.
2. The Debtor has failed to:
 - a. File an amended plan.
 - b. Resolve IRS and IDOR proof of claims.
3. As a result, the Debtor has failed to comply with the Bankruptcy Code and has caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350

Respectfully Submitted;

/s/ Pamela L. Peterson
FOR: Glenn Stearns, Chapter 13 Trustee